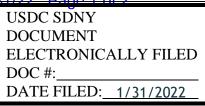


Amy E. Davis 214-838-3501 adavis@cdfirm.com







January 31, 2022





Via ECF

Honorable Gregory H. Woods United States District Court Southern District of New York Daniel Patrick Moynihan United States Court House 500 Pearl Street, Room 2260 New York, NY 10007

RE: Adams et al. v. Deva Concepts, LLC, 1:20-cv-09717-GHW

Bates et al v. Dev A Concepts, LLC, 1:20-cv-09056-GHW

Dear Judge Woods:

Plaintiffs in the above-referenced matters write to request an extension of the upcoming deadlines for filing Plaintiffs' amended complaints and the filing schedule for Deva Concepts' responsive pleadings and any response or reply briefing. Deva Concepts consents to this request.

The Court ordered the following schedule on January 24, 2022 at the request of the parties:

February 2, 2022: Plaintiffs' deadline to file amended complaints.
February 23, 2022: Deva Concepts' deadline to file responsive pleadings.
March 23, 2022: Plaintiffs' deadline to oppose a motion to dismiss, if filed.
April 6, 2022: Deva Concepts' deadline to file a reply brief in further support of a motion to dismiss, if filed.

The parties proposed these dates on January 19, 2022. Since then, lawyers representing plaintiffs and/or key members of their staff have been ill with Covid. These illnesses have significantly impacted Plaintiffs' ability to meet the current deadlines.

Consequently, Plaintiffs, with the consent of Deva Concepts, request the Court briefly extend these deadlines as follows:

February 16, 2022: Plaintiffs' deadline to file amended complaints.

March 23, 2022: Deva Concepts' deadline to file responsive pleadings.

April 20, 2022: Plaintiffs' deadline to oppose a motion to dismiss, if filed.

May 4, 2022: Deva Concepts' deadline to file a reply brief in further support of a motion to dismiss, if filed.

Accordingly, the parties respectfully request that the Court revise the current deadlines to follow the above-proposed schedule.

Respectfully submitted,

s/Amy E. Davis

Amy E. Davis Counsel for Plaintiffs in *Adams*

s/ Randi R. GeffnerRandi R. GeffnerCounsel for Plaintiffs in Bates

s/ Keith E. Smith
Keith E. Smith

Counsel for Deva Concepts, LLC

cc: All Counsel of Record

Plaintiffs' request for an extension is granted. The Court adopts the proposed deadlines set forth above.

SO ORDERED.

Dated: January 31, 2022 New York, New York

GREGORY H. WOODS United States District Judge